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VIA ECF

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: Freeplay Music, LLC v. Sun TV Network Ltd., Civ. No. 16-06310

Dear Judge Carter:

This firm represents plaintiff Freeplay Music, LLC (“FPM”) in the above-referenced matter. We write to bring to the Court’s attention the fact that the defendant is a foreign company located in Chennai, Tamil Nadu, India. Thus, the 90-day time limit for service under Federal Rule of Civil Procedure 4(m)—which would ordinarily expire on November 7, 2016—is not applicable here.

FPM has commenced the procedure for serving the defendant in its foreign jurisdiction through the Central Authority in Delhi, India as is required under the Hague Service Convention. FPM has also hired local counsel in India to assist with expediting service. Service has not yet been completed. We will advise the Court of any further updates and notify the Court promptly upon the completion of service.

We appreciate Your Honor’s attention to this matter.

Respectfully submitted,

s/Michelle Usitalo

Michelle R. Usitalo